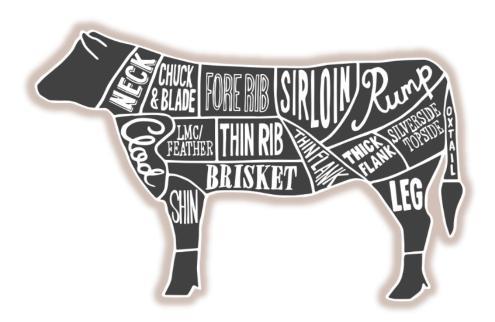


FY21 Annual Report Meat and Poultry Inspection Bureau



Mission

Montana's Meat and Poultry Inspection Bureau mission is to ensure that meat and poultry slaughtered, processed, and stored within the state meet all state and federal requirements for wholesome and unadulterated products. This is accomplished through product and site inspections, licensing, product labeling and laboratory testing.

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FY21 Summarization Statement from Bureau Chief

During the last fiscal year, a great deal of time was spent preparing for a federal on-site audit to be conducted in early FY22. The Montana Meat and Poultry Inspection program (MPI) is scheduled for an on-site audit conducted by the Food Safety & Inspection Service (FSIS), Federal State Audit Branch (FSAB), of the United States Department of Agriculture (USDA). Every 3 years the FSAB audits the state meat inspection program. These audits provide assurance to the USDA that Montana is carrying out its inspection duties at least equal to that of the USDA's inspection services. Because of the focused pre-audit work, Montana MPI is prepared and ready for auditors to arrive.

The Meat and Poultry Inspection Bureau filled the Vacant Enforcement Investigation and Analysis Officer (EIAO) position. Alicia Love, a registered sanitarian, was hired to fill the role of EIAO and brings a strong background in food safety to the bureau. During FY21, Alicia completed three major training courses to bring her up to speed in the meat industry. Inspection Methods, Further Processing and Labeling, and Enforcement Investigation, and Analysis Officer courses were all completed before the end of FY21. In addition, all inspection staff have completed the Inspection Methods training provided by the USDA. This training will benefit both the industry and consumers by having consistently trained staff that can answer often complex questions based upon sound scientific principles. As more virtual classes open, MPI will continue to nominate inspection staff to attend.

On a downside, the Meat and Poultry Inspection Bureau saw a significant number of vacancies among inspector positions. Montana MPI is concerned due to the number of staff that have been recruited by the USDA for similar inspector positions. One position left before the end of the fiscal year while two other inspectors are expected to leave prior to the end of FY22.

In addition to losing inspectors to other positions, Montana MPI is facing challenges in filling the vacant positions with few persons submitting applications, and even fewer that are qualified for the open inspector positions. In particular, filling the inspector position in Bozeman has been challenging. Several posting cycles have only yielded one qualified applicant that turned the position down after being unable to find affordable housing in the Bozeman area. Montana MPI will continue to work to find qualified applicants to fill positions so we can continue to provide inspection services to the meat industry.

Montana saw an unusual number of humane handling issues in establishments in FY21. Humane handling is an important part of meat inspection. Inspectors examine the slaughter of each animal to ensure that it is killed humanely. Establishments affected by humane handling noncompliance this fiscal year were quick to address causal issues and return to compliance.

Montana also saw a spurt of growth in the meat industry. Early in FY21, the Governor made the meat industry a priority by announcing a grant program designed to increase Montana's capacity for meat production. The grant program, administered by the Montana Department of Agriculture, was intended to help recipients increase storage capacity and assist with purchases of new buildings and equipment. According to the Department of Agriculture, there were 234 applicants with 105 of those applicants receiving grant funding. The total amount of grants awarded was \$12.2 million. Both new and existing businesses took advantage of the grant and are working toward enhancing the meat industry in Montana. For example, establishments installed new coolers, purchased new equipment, expanded slaughter floors, and built new retail counters. All the steps taken by establishment owners were designed to increase slaughter and processing capacity in Montana plants.

In summary, in FY21, the Meat and Poultry Inspection Bureau increased its standard of excellence in many areas of the program by improving training and clarifying regulations. The Bureau is committed to continuing

this trend. As we provide better regulation, Montana meat consumers will continue to benefit well into the future.

What the Future Holds

The Meat and Poultry Inspection Bureau looks forward to the next fiscal year and believes it will be a year of strong program growth. Although some business sectors have not fared well through the COVID-19 pandemic, the meat industry in Montana has seen strong demands from consumers. As those demands increase, so does the need for regulation.

In FY21, Montana MPI has begun the process to hire new inspectors. Down four inspectors, the Northwest district will need to hire two new inspectors and expect to hire an additional two inspectors before the end of October. Once fully staffed, the Northwest district will have regular inspectors to cover all establishment's inspection needs as well as relief inspection staff to help cover assignments when there are time off requests.

Part of the program growth will come in the way of a Cooperative Interstate Shipment Program (CIS). A CIS program will enable participating establishments to slaughter and process meat under a state program and ship products across state lines. Without a CIS program, state inspected establishments are limited to selling their meat products within state borders. Industry and the legislature have examined the benefits of a CIS and during the most recent legislative session. To help with starting a CIS program the legislature provided funding to pay for costs associated with the development of the program. In September of 2021, the Montana MPI program submitted an application to FSIS for consideration of developing a CIS program. FSIS is examining the application and will be contacting the program to address any questions they might have. Once the program has been developed, the meat industry will expand due to the increased volume of product being sold out of state.

The outlook for the next fiscal year is promising. Industry remains supportive of the program and its application of regulation. Through enhanced communication and regulatory decisions being made based upon the application of scientific principles, the regulators and those regulated will all play a role to produce safe, wholesome meat products for all consumers.

Authorization

According to section two of the Federal Meat Inspection Act, "Meat and meat food products are an important source of the nation's total supply of food. They are consumed throughout the nation and the major portion thereof moves in interstate or foreign commerce. It is essential in the public interest that the health and welfare of consumers be protected by assuring that meat and meat food products distributed to them are wholesome, not adulterated, and properly marked, labeled and packaged..."

The Montana Meat and Poultry Inspection Bureau operates in a manner similar to the other 26 states with a cooperative state meat inspection program. Montana carries out its own inspection services in a manner that is "at least equal to" inspection services provided by the United States Department of Agriculture (USDA), as well as utilizing the federal Public Health Information System (PHIS) a web-based data driven system that utilizes role assignments and predictive analytics to collect, consolidate and analyze establishment data to generate and assign specific inspection tasks to improve food safety.

To help meet the federal "at least equal to" standard, Montana has adopted both federal law and rule. Under 81-9-219, Montana Code Annotated (MCA), Montana adopts the Federal Meat Inspection Act, the Federal

Poultry Inspection Act, and the Federal Humane Methods of Slaughter Act. Each of these federal acts addresses various aspects of how the Montana program operates.

Further, Administrative Rules of Montana (ARM) 32.6.712 adopts Title 9 of the Code of Federal Regulations (CFR). These rules outline how Montana is to carry out its meat and poultry inspection program. In addition, Montana Meat and Poultry Inspection utilizes other laws and rules under Title 81 of MCA and Title 32 of ARM.

Organization and Funding

The Meat and Poultry Bureau operates on an annual budget of approximately \$1.7 million which consists of 50% federal funding and 50% state general fund. The program has 24 FTE (full time employee) positions.

Montana Meat and Poultry Inspection Bureau is organized into three main units: administration, inspection, and audit units.

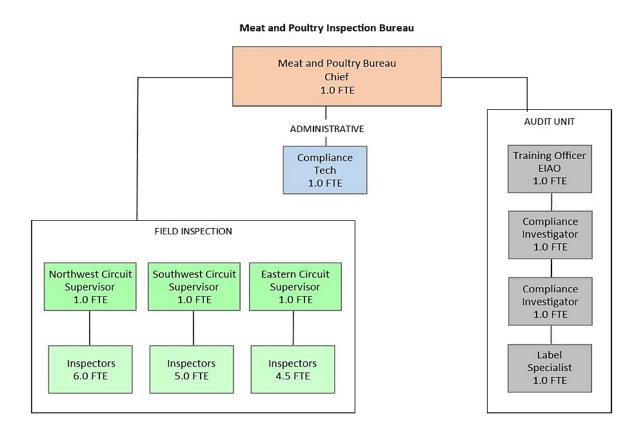


Figure 1: Meat and Poultry Inspection Bureau Organizational Chart

Administrative Unit

The Program Administration Unit provides program oversight, strategic planning, performance management, program licensing, and database management. This unit is responsible for assuring administrative requirements of FSIS are met.

The compliance tech issues licenses and renewals annually using the LIVAPPS data software system. All slaughter records and meat and poultry products poundage are also entered into LIVAPPS and compiled for quarterly statistical reporting. Headcount data is also compiled and reported to Montana Agricultural Statistics and FSIS each quarter.

All inspection staff must obtain and maintain clearance to the secure federal Public Health Information System (PHIS) for recording inspection duties. The clearance process as well as issuing of all USDA issued equipment is handled by the administrative unit assuring all inspectors can receive proper clearance and USDA LincPass identity cards as required. The compliance tech serves the roles of Grant Curator, Role Management Analyst, and User Administrator for Montana in PHIS maintaining inspection staff assignments and establishment information.

The administrative unit is responsible for invoicing establishments for fees incurred for any overtime, holiday, or weekend inspection service as well as charges for inspection services for any species "non-amenable" to the Federal Meat Inspection Act (i.e., bison, elk, alpaca, etc.) as required by regulation are billed monthly. Fees are tracked and reported to FSIS.

See Appendix 1 for Licenses

Microbiological Testing

Montana's inspection program conducts product sampling for detecting pathogens in meat and poultry products. The Administrative Unit compliance tech coordinates the program's product sample testing. Establishment sampling is directed to each inspector monthly and must be monitored to assure required frequencies are met and that any product sample found positive for any pathogen is addressed as required. These efforts may include increased sampling, a Food Safety Assessment, or a revision to the plant's Hazard Analysis Critical Control Point (HACCP) system.

In FY21 the Montana program worked with the Montana Public Health Laboratory to test for a variety of pathogens such as *Salmonella*, *E. coli O157:H7*, six major non-O157 shiga toxin producing *E. coli* (STECS), and *Listeria Monocytogenes*. The Bureau also works with Montana State University animal science laboratory for water activity readings. Inspection staff conduct residue sampling for both the National Residue Program and local kidney swab testing (KIS) for residue testing of show animals or any animal that may be suspected of recent injection. There may also be food chemistry testing requirements in certain products.

In the federal fiscal year ending June 30, meat and poultry inspectors will collect approximately 180 raw beef samples and 135 ready-to-eat product samples for testing. Montana also tests raw ground bison meat intended for sale. Montana's sampling program is a critical component for assuring that products produced under inspection are safe for consumers. Staff records each sample by lot, date of collection, and verifies products are held from commerce until the sample results are confirmed negative.

Inspection Unit

District Supervisors

The image below represents the three supervisory circuits in Montana: Northwest, Southwest and Eastern.

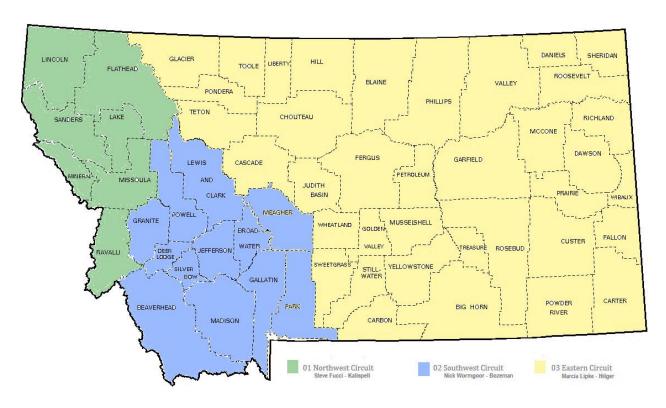


Figure 2: Meat and Poultry Inspection Bureau map of supervisory circuits. Eastern Montana counties with lower populations and no inspected establishments allow large area coverage.

The 3 circuit supervisors are responsible for local meat inspection staff in their district to assure establishments are being provided inspection services as granted. They assure that field inspectors are completing their job duties as assigned, approve time and schedules, and complete job performance appraisals as required. Supervisors provide both slaughter and processing relief inspection as necessary.

Inspector supervisors work with businesses applying for inspection services. They use their knowledge of hazard analysis and HACCP plans to assure both inspection staff and plant personnel are following regulations. Supervisors travel many miles to conduct onsite plant reviews throughout the year, assist staff at plants, provide inspection coverage when necessary.

New inspectors are required to receive virtual Inspection Methods training from FSIS in their first year. Training covers all aspects of livestock slaughter, including human handling requirements, and critical control points in production of products produced under state inspection. Staff must also keep up with general computer software updates as well as their functions in the PHIS system.

Inspection Unit – continued

Field Inspectors

Montana MPI inspectors carry out day to day inspection of livestock and poultry products at officially inspected establishments. Those same inspectors also inspect all custom exempt operations and meat storage units throughout the year. As of the end of FY21 this included 31 officially inspected establishments, 136 custom exempt operations, and 168 meat storage units.

An inspector must be onsite during slaughter operations. Animal carcasses and organs exhibiting questionable conditions or disease symptoms are retained for final disposition by a veterinarian under contract with the agency for their services. All slaughter operations are done under the sanitation guidelines required by USDA and establishments must adhere to strict humane handling regulations.

Inspectors also oversee the processing of meat and poultry products. Personnel are trained in food safety Hazard Analysis Critical Control Points (HACCP) and proper record keeping. All products produced under inspection must follow a HACCP plan and staff must document hazard analysis steps, critical control points and all recording inspection tasks in PHIS to assure the proper steps and processes are followed. They provide pre-operational inspection to verify sanitation procedures are met at the start of each process and/or day. Documenting daily duties can be extensive and time consuming. These records are available for inspection by supervisors and FSIS at any time.

Inspectors also check for correct labeling of products, including review of ingredients and net weights; assure the mark of inspection is used properly; look for any safety hazards or sanitation concerns in the production area; and conduct meetings with plant management regarding various subjects and regulations.

Montana MPI inspection staff are required to keep up on all FSIS Notices and Directives issued by USDA as guidance on the application of regulation. Staff must determine which regulation is applicable to an establishment.

Montana Meat and Poultry Inspection staff also oversee custom exempt facilities. These facilities may only slaughter and process product for use by the owner, members of his household, and non-paying guests. Products from custom operations may not be resold and must be marked "not for sale". Like officially inspected establishments, custom exempt facilities are required to meet and follow all sanitation guidelines. Although not subject to animal by animal inspection, onsite inspections of custom exempt facilities and records are conducted no less than twice per year. Meat and/or poultry storage sites are reviewed once per year.

See **Appendix 2** for FY21 state inspected slaughter headcounts

See Appendix 3 for FY21 custom exempt slaughter headcounts

See Appendix 4 for FY21 state inspected product poundage

Audit Unit

The Audit Unit consists of an Enforcement, Investigations and Analysis Officer (EIAO), a label specialist, and two compliance investigators. These functions are focused on regulations that govern outside the in-plant inspection process.

The EIAO is part of the staff required to meet the "at least equal to" obligations for state meat inspection programs. The program EIAO attended a 12-day virtual EIAO training course, in addition to the two-week Inspection Methods course. The EIAO has several job duties including conducting food safety assessments (FSAs), providing outreach to Montana meat producers, and participating in recall activities. In addition, the EIAO will provide training for inspection staff and oversees the audit unit

Food Safety Assessments

The main responsibility of the EIAO is to conduct a Food Safety Assessment (FSA). FSAs are comprehensive reviews of an establishment's food safety systems including the hazard analysis, HACCP plan, sanitation, microbiological testing, plant production practices, and any other practices and procedures that impact food safety. FSIS recommended frequency for routine FSAs is no less than once every four years, and a "for cause" FSA must occur as needed.

During an FSA, the EIAO may spend several days in an official establishment reviewing written documentation as well as observing all aspects of slaughter and product production. In establishments that produce ready-to-eat products, the EIAO also collects environmental samples testing for *Listeria Monocytogenes*.

The EIAO makes enforcement recommendations based on the findings of the FSA. FSAs are entered into the Public Health Information System as part of the permanent record for each establishment.

Labeling

The labeling specialist ensures that meat and poultry products are properly labeled prior to entering commerce.

This position provides label training to both inspectors and establishment personnel.

Proper labeling contains important consumer information such as product identification, net weights, ingredients, and allergens. Labels of products produced under inspection must all bear the mark of inspection. Label approval is an ongoing, ever changing procedure as new establishments are brought under inspection and current establishments add products, update product formulas, ingredients, and label designs.

The label specialist visits state inspected establishments annually and audit labels to assure products are being marketed to consumers with correct information. Audits are conducted to assure ingredient statements are correct.

This position also provides relief inspection.

Audit Unit - continued

Compliance

Montana Meat and Poultry Inspection has two compliance investigators who travel around the state ensuring retail establishments that deal in meat and poultry products are following both state and federal laws. Compliance staff may also investigate consumer complaints, ensure adulterated and misbranded product are removed from commerce, and investigate the sales of meat or poultry outside the regulatory framework.

Compliance investigators provide outreach and education to the public.

Compliance investigators travel statewide to assure local meat supply is unadulterated and labeled properly. They work in partnership with the USDA compliance officer based out of the Port of Sweet Grass.

Staff and Districts

Administrative Unit Staff

Bureau Chief, Helena – Gary Hamel, Helena HQ

Compliance Tech, Helena – Bonnie Marceau, Helena HQ

Inspection Unit Staff

District Supervisors

Circuit 01: Northwest district supervisor – Stephen Fucci, Columbia Falls

Circuit 02: Southwest district supervisor – Nick Wormgoor, Belgrade

Circuit 03: Eastern district supervisor – Marcia Lipke, Hilger

State Meat & Poultry Inspectors

Region 1-Flathead: Lance Parsley, Kalispell

Region 2-Northcentral: Vanessa Thompson, Great Falls
Region 3-Ravalli: Jennifer Alm Meinzen, Lolo

Region 4-Silverbow, Powell, Granite, Deer Lodge: Lori Mulcahy, Butte

Region 5-Blaine, Phillips

Region 6-Gallatin, Park, Broadwater

Region 8- Beaverhead, Madison:

Kathi Molyneaux, Chinook

Austin Hoopes, Helena

John Elmore, Dillon

Region 9- Lewis & Clark, Meagher:

Region 10 Flathead, Lincoln:

Region 11 Northeastern:

Region 13 Southeastern:

Region 14-Mineral, Sanders:

Don Holwegner, Bozeman

Andrew DeLeon, Kalispell

Rom Hedges, Antelope

Lorri Hammond, Billings

Kayla Papesh, Superior

Region 15 Missoula, Lake: Vacant

Region 16/Relief: Steve Buchanan, Big Timber

Western Relief: Caleb Bagnell, Missoula

Staff and Districts, Inspection Unit Staff continued

The image below reflects the bureau's fourteen inspection regions

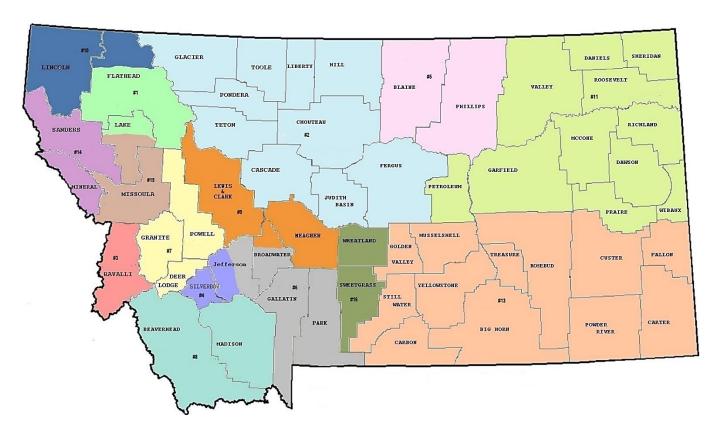


Figure 3: Inspector regions

Audit Unit Staff

Enforcement, Investigations and Analysis Officer (EIAO), Helena – Alicia Love (March hire), Helena HQ

Label Specialist / Relief Inspection, Helena – Samantha Novak, Helena HQ

Compliance Investigators -

James Peterson, Bozeman Ben Schmidt, Columbia Falls

Appendix 1 - Licenses

346 licensed facilities. License numbers in each supervisory circuit:

Circuit 01 – Northwest & Western Montana

State Inspected Plants: 13 Custom Exempt Facilities: 17 Meat Depot Storage Units: 55

Circuit 02 - Southwest & Central Montana

State Inspected Plants: 11
Custom Exempt Facilities: 24
Meat Depot Storage Units: 47

Circuit 03 – Eastern & Northcentral Montana

State Inspected Plants: 7
Custom Exempt Facilities: 99
Meat Depot Storage Units: 73

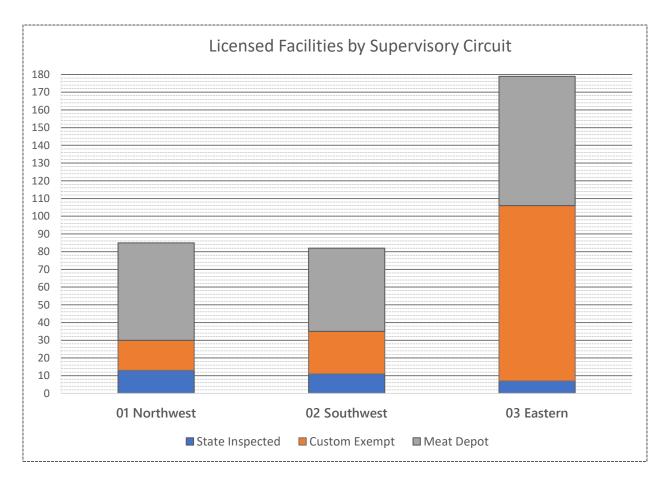


Figure 4: License Types by Supervisory Circuits

APPENDIX 2 - FY21 State Inspected Slaughter

State Inspected – Livestock slaughter headcounts

Animal Code	Animal Type	July	Aug.	Sept.	Oct.	Nov.	Dec.	Jan.	Feb.	Mar.	Apr.	May	June	TOTALS
0101	Steer	258	304	341	333	209	346	296	301	313	205	272	352	3530
0102	Heifer	125	58	92	132	99	145	150	139	176	164	140	157	1577
0103	Beef Cow	114	94	69	68	81	111	114	84	110	140	121	142	1248
0105	Bull	30	19	20	19	14	15	9	17	38	40	40	30	291
1604	Heavy Calf	0	0	0	0	0	0	0	0	1	0	0	0	1
0202	Market Swine	645	882	634	464	469	422	360	333	462	460	326	527	5984
0203	Sow	25	13	9	16	15	8	7	19	21	12	7	17	169
0204	Boar	0	0	0	0	0	0	0	1	0	0	0	3	4
0301	Lamb	69	120	104	134	143	166	104	86	172	123	136	157	1514
0302	Sheep	68	30	26	18	5	5	30	30	66	15	35	21	349
0401	Goat	17	4	1	41	2	10	9	2	9	3	0	7	105
1403	Elk	0	4	14	0	0	0	46	0	0	2	0	0	66
1404	Bison	7	5	2	44	6	11	15	8	10	5	0	4	117
1499	Other Voluntary	0	0	0	5	0	0	2	1	10	2	3	32	55
		1358	1533	1312	1274	1043	1239	1142	1021	1388	1171	1080	1449	15010

Table 1: FY21 State Inspected livestock slaughter headcounts

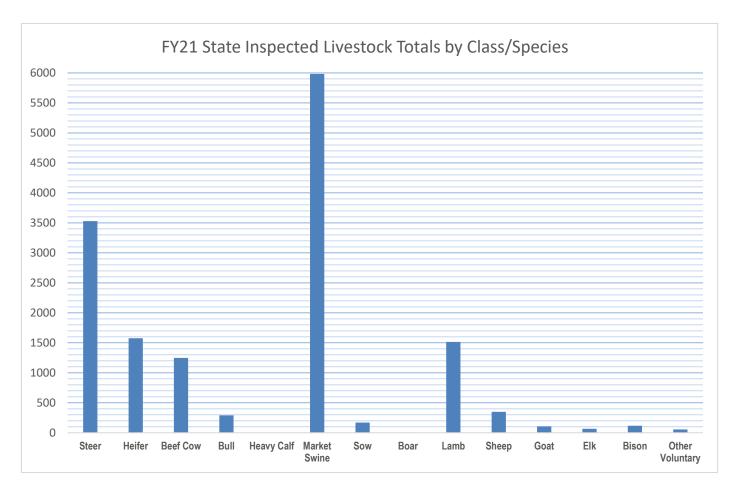


Figure 5: FY21 State inspected livestock slaughter

APPENDIX 2 - FY21 State Inspected Slaughter continued

State Inspected – Poultry Slaughter

Animal Code	Animal Type	July	Aug.	Sept.	Oct.	Nov.	Dec.	Jan.	Feb.	Mar.	Apr.	May	June	TOTALS
0601	Young Chicken	2626	1288	2814	1729	1305	2857	0	1307	2081	1128	1827	1200	20162
0702	Young Turkey	57	0	7	3583	0	0	0	0	901	0	0	808	5356
0801	Duck	0	0	0	0	0	0	0	0	0	0	0	0	0
0901	Goose	0	0	0	0	0	0	0	0	0	0	0	0	0
1199	Ratite	354	0	0	0	0	0	0	0	0	0	0	0	354
1301	Rabbit	25	21	0	0	0	38	15	0	0	0	0	0	99
		3062	1309	2821	5312	1305	2895	15	1307	2982	1128	1827	2008	25971

Table 2: FY21 State inspected poultry slaughtered

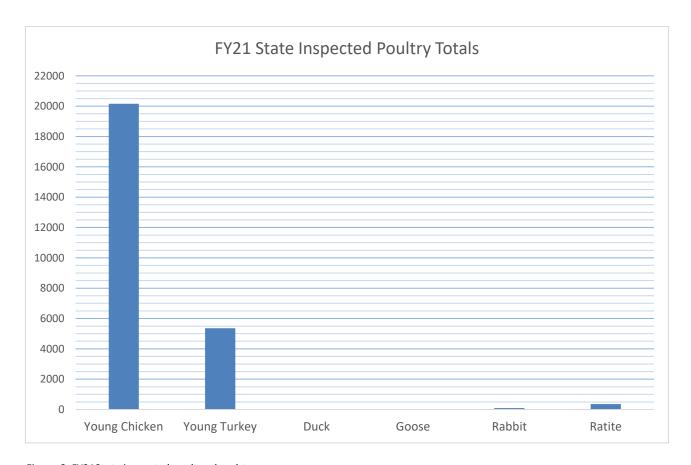


Figure 6: FY21State inspected poultry slaughter

APPENDIX 3 - FY21 Custom Exempt Slaughter

Custom Exempt – Livestock slaughtered headcounts

Animal Code	Animal Type	July	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Totals
0101	Steer	264	287	933	1811	3263	441	0	218	208	1293	2304	1141	12163
0102	Heifer	126	181	357	908	1024	111	0	55	36	528	1404	308	5038
0103	Beef Cow	95		246	657	784	103	0	0	44	318	654	307	3208
0105	Bull	23	53	120	279	364	14	0	0	6	141	304	108	1412
0202	Market Swine	366	344	1108	1241	3796	768	0	0	114	543	1891	733	10904
0301	Lamb	0	0	85	0	0	83	0	0	18	60	247	162	655
0302	Sheep	161	25	103	149	744	23	0	0	62	84	368	164	1883
0401	Goat	0	3	10	3	20	1	0	0	4	10	25	7	83
1404	Bison	4	3	43	50	94	16	0	0	27	29	33	17	316
1499	Other	0	0	0	0	4	0	0	0	0	0	0	1	5
		1039	896	3005	5098	10093	1560	0	273	519	3006	7230	2948	35667

Table 3: FY21 Custom exempt livestock slaughter

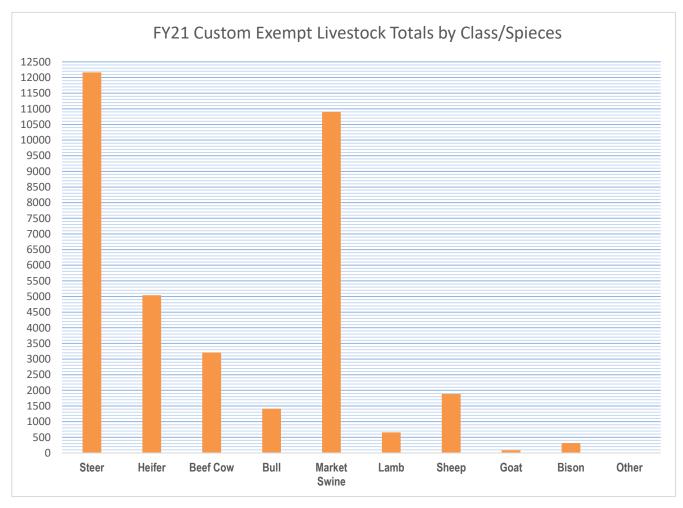


Figure 7: FY21 Custom exempt livestock slaughter

APPENDIX 3 - FY21 Custom Exempt Slaughter continued

Custom Exempt – Poultry slaughtered headcounts

Animal Code	Animal Type	July	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Totals
0601	Young Chicken	5115	1200	5091	9738	10336	2150	0	0	0	38885	22878	16102	111495
0702	Young Turkey	560	0	1250	3080	8519	0	0	0	0	4484	8904	5375	32172
0801	Duck	750	0	550	200	735	0	0	0	0	618	0	1463	4316
0901	Goose	0	0	0	379	0	0	0	0	0	0	0	0	379
		6425	1200	6891	13397	19590	2150	0	0	0	43987	31782	22940	148362

Table 4: FY21 Custom exempt slaughtered poultry

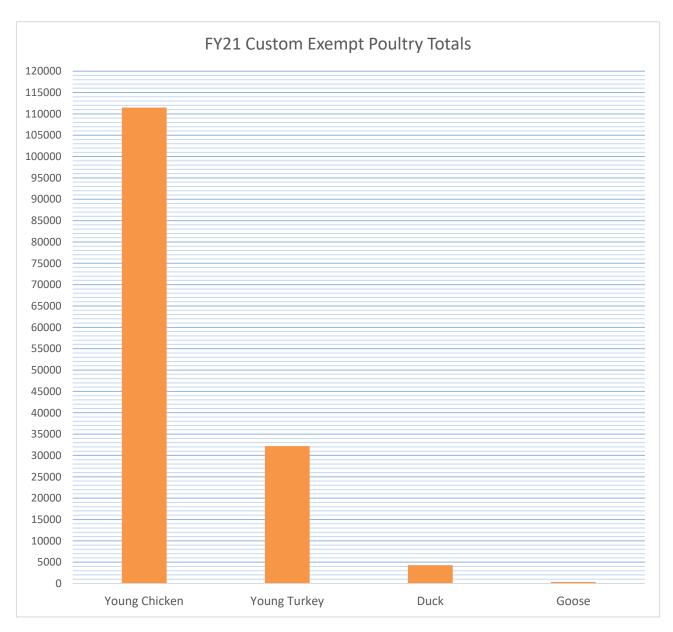


Figure 8: FY21 Custom exempt poultry slaughter

Appendix 4 – FY21 Inspected Product Poundage Produced

Products produced under inspection services are tracked by the HACCP categories outlined in CFR 417.2. They include:

- Raw Ground raw product that is put through a grinding process; like ground beef and ground pork
- Raw Not Ground product that is not ground and intact; like carcass halves & quarters, cuts (bone-in or boned), primals & sub-primals (steaks, chops)
- Not Heat Treated Shelf Stable product is acidified/fermented processed without heat/cooking
- Heat Treated Shelf Stable product is processed with heat and/or drying until shelf stable, like jerky and snack sticks
- Fully Cooked Not Shelf Stable products that are brought up to required cooking temperatures but not shelf stable, like some hams and sausages
- Heat Treated Not Fully Cooked Not Shelf Stable products are processed with heat but not fully cooked and therefore not shelf stable, like bacon, sausages, or even some pasties and burritos.

FY21 State Quarterly Inspected Product Poundage by Category

1st	2nd	3rd	4th	Total FY21 Poundage Processed
361794	354114	342920	352012	1,410,840
918959	888808	1186404	1151962	4,146,133
940	115	170	283	1,508
20581	24857	20385	25865	91,688
105001	91720	88335	104797	389,853
35313	22820	26591	31451	116,175
	361794 918959 940 20581 105001	361794 354114 918959 888808 940 115 20581 24857 105001 91720	361794 354114 342920 918959 888808 1186404 940 115 170 20581 24857 20385 105001 91720 88335	361794 354114 342920 352012 918959 888808 1186404 1151962 940 115 170 283 20581 24857 20385 25865 105001 91720 88335 104797

POULTRY	1st	2nd	3rd	4th	Total FY21 Poundage Processed
03B Raw Ground	29428	645	325	40	30438
03C Raw Not Ground	43626	86041	32343	38874	200884
03E Not Heat Treated Shelf Stable	0	11	6	5	22
03F Heat Treated - SS	0	0	0	0	0
03G Fully Cooked - Not SS	15428	18301	15800	16836	66365
03H Heat Treated - Not Fully Cooked - Not SS	230	120	120	120	590

Table 5: State inspected meat and poultry products produced by HACCP category each quarter in FY21